

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Nicholas J. Cremona

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

DAVID SHAPIRO NOMINEE 4,

and

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04305 (SMB)

DAVID SHAPIRO, individually and as
President and nominee of David Shapiro
Nominee 4,

Defendants.

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: December 21, 2015.
2. Fact Discovery shall be completed by: September 26, 2016.
3. The Disclosure of Case-in-Chief Experts shall be due: December 16, 2016.
4. The Disclosure of Rebuttal Experts shall be due: February 14, 2017.
5. The Deadline for Completion of Expert Discovery shall be: March 16, 2017.
6. The Deadline for Service of a Notice of Mediation Referral shall be: March 23, 2017.
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before April 6, 2017.
8. The Deadline for Conclusion of Mediation shall be: On or before August 4, 2017.

Dated: New York, New York
September 29, 2015

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona

David J. Sheehan

Nicholas J. Cremona

45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

Brett Wall (*admitted pro hac vice*)

Jason Perdion (*admitted pro hac vice*)

David Proaño (*admitted pro hac vice*)

Gretchen Lange (*admitted pro hac vice*)

Darren Crook (*admitted pro hac vice*)

1900 East 9th Street, Suite 3200

Cleveland, OH 44114

Telephone: (216) 861-7834

Facsimile: (216) 696-0740

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and for the Estate of Bernard
L. Madoff*